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October 12, 2007  
(PBW Project No. 1381)

VIA OVERNIGHT COURIER

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-AP)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: September 2007 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport,  
Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
    - Subtask 6.3 – Evaluation of Phase 1 soil sample data was performed. A letter proposing Phase 2 soil investigation activities was sent to you on September 11, 2007.
    - Subtask 6.5 – A non-aqueous phase liquid (NAPL) evaluation and water-level measurement event was performed on September 6, 2007. Evaluation of these and other Phase 1 and 2 groundwater data was performed.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:



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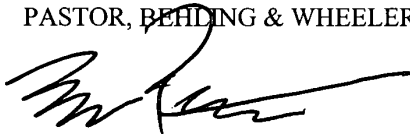
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- Water levels measured on September 6, 2007 are summarized in the attached Table 1. No indications of NAPL were observed during this water-level measurement event.
- 3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
  - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather and access permitting) including:
    - Subtask 6.3 – Soil investigation – to be continued through soil sample collection and analyses, data validation, and data evaluation.
    - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through additional Zone B monitoring well installation and development, groundwater sampling and analysis, data validation, hydraulic testing, and data evaluation.
    - Subtask 6.7 – Sediment investigation – to be continued through analytical data evaluation.
- 4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 50% complete. No delays were encountered this month.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

Attachments

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Robert L. Iuliucci - Sequa Corporation  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Rob Rouse - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP

**Table 1 - September 6, 2007 Water Levels**

| <b>Well ID</b> | <b>Date</b> | <b>Time</b> | <b>MP<sup>1</sup><br/>Elevation<br/>(ft AMSL<sup>2</sup>)</b> | <b>Depth to<br/>Water (ft<br/>BMP<sup>3</sup>)</b> | <b>Water<br/>Elevation (ft<br/>AMSL)</b> |
|----------------|-------------|-------------|---|--|--|
| ND2MW01        | 9/6/2007    | 1031        | 5.09  | 4.02   | 1.07                                     |
| ND3MW02        | 9/6/2007    | 0859        | 6.41  | 4.27   | 2.14                                     |
| ND4MW03        | 9/6/2007    | 0847        | 6.20  | 3.84   | 2.36                                     |
| NE1MW04        | 9/6/2007    | 1003        | 4.90  | 3.93   | 0.97                                     |
| NE3MW05        | 9/6/2007    | 0913        | 6.53  | 3.63   | 2.90                                     |
| NF2MW06        | 9/6/2007    | 0956        | 5.35  | 3.89   | 1.46                                     |
| SB4MW07        | 9/6/2007    | 0756        | 7.57  | 5.57   | 2.00                                     |
| SE1MW08        | 9/6/2007    | 0813        | 7.54  | 5.31   | 2.23                                     |
| SE6MW09        | 9/6/2007    | 0735        | 7.66  | 5.72   | 1.94                                     |
| SF5MW10        | 9/6/2007    | 0742        | 8.01  | 5.75   | 2.26                                     |
| SF6MW11        | 9/6/2007    | 0719        | 8.11  | 6.34   | 1.77                                     |
| SF7MW12        | 9/6/2007    | 0726        | 7.96  | 6.59   | 1.37                                     |
| SG2MW13        | 9/6/2007    | 0821        | 7.71  | 5.56   | 2.15                                     |
| SH7MW14        | 9/6/2007    | 0709        | 8.10  | 6.21   | 1.89                                     |
| SJ1MW15        | 9/6/2007    | 0829        | 5.61  | 3.47   | 2.14                                     |
| SJ7MW16        | 9/6/2007    | 0657        | 7.19  | 5.23   | 1.96                                     |
| SL8MW17        | 9/6/2007    | 0652        | 5.87  | 4.07   | 1.80                                     |
| NB4MW18        | 9/6/2007    | 1058        | 4.96  | 3.17   | 1.79                                     |
| NG3MW19        | 9/6/2007    | 0921        | 5.08  | 3.29   | 1.79                                     |
| OMW20          | 9/6/2007    | 1021        | 4.88  | 3.76   | 1.12                                     |
| OMW21          | 9/6/2007    | 1007        | 5.73  | 3.96   | 1.77                                     |
| SA4MW22        | 9/6/2007    | 0803        | 7.79  | 6.34   | 1.45                                     |
| ND4MW24B       | 9/6/2007    | 0853        | 5.70  | 3.41   | 2.29                                     |
| NG3MW25B       | 9/6/2007    | 0927        | 4.91  | 3.01   | 1.90                                     |
| OMW27B         | 9/6/2007    | 1013        | 5.45  | 3.04   | 2.41                                     |
| NC2MW28        | 9/6/2007    | 1036        | 4.76  | 2.42   | 2.34                                     |
| ND3MW29        | 9/6/2007    | 1044        | 5.33  | 3.58   | 1.75                                     |
| MW-1           | 9/6/2007    | 0806        | 6.75  | 4.21   | 2.54                                     |
| MW-2           | 9/6/2007    | 0714        | 5.88  | 3.64   | 2.24                                     |
| MW-3           | 9/6/2007    | 0704        | 7.23  | 5.41   | 1.82                                     |
| HMW-1          | 9/6/2007    | 0907        | 5.15  | 2.61   | 2.54                                     |
| HMW-2          | 9/6/2007    | 1052        | 4.69  | 3.63   | 1.06                                     |
| HMW-3          | 9/6/2007    | 0947        | 5.20  | 3.54   | 1.66                                     |
| BM-1           | 9/6/2007    | 0936        | 3.53  | 1.55   | 1.98                                     |
| BM-2           | 9/6/2007    | 0936        | 3.30  | 1.35   | 1.95                                     |
| BM-3           | 9/6/2007    | 0749        | 5.10  | 3.60   | 1.50                                     |

Notes:

<sup>1</sup> MP = Measurement Point (Top of PVC well casing).

<sup>2</sup> AMSL = Above Mean Sea Level (NGVD 29).

<sup>3</sup> BMP = Below Measurement Point.